

DAULT & ASSOCIATES, PLLC
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA**

In Re:

**JEFF M. GOODYEAR &
MOLLY DEE HOLLAND,**

Debtors.

Chapter 7

Case Number 4:10-bk-25147-EWH

Motion to Reinstate Case

MOTION TO REINSTATE CASE

COMES NOW Debtors in this matter by and through counsel, Brian C. Dault, and hereby motion this Honorable Court to issue an order reinstating the Debtor's case so that they may properly file the Declaration of Electronic Filing.

Debtors provided all information well before the notice of missing documents and intended that such Declaration of Electronic Filing be filed with the Court. Because of oversight and excusable neglect on the part of Debtor's counsel and circumstances beyond Debtor's control, the Declaration of Electronic Filing did not get filed and a dismissal was issued without discharge. Debtors took all appropriate action in this matter and should not be held accountable for their counsel's oversight. Debtors hereby respectfully request this court to grant this motion to reinstate the case so the Declaration of Electronic Filing can be properly filed and a discharge considered.

WHEREFORE, the debtors pray that the court issue an order:

- a. Reinstating their case; and
- b. Granting the debtors such other and further relief as the Court may deem just and equitable under the circumstances.

DATED this 21st day of October 2010.

Respectfully Submitted,

/s/ Brian C. Dault
Brian C. Dault #27021

ORIGINAL filed electronically and COPIES of the foregoing mailed this 21st day of October, 2010 to the following:

**Jeff M. Goodyear &
Molly Dee Holland**
10929 E. SUNFLOWER COURT
FLORENCE, AZ 85232

U.S. TRUSTEE
OFFICE OF THE U.S. TRUSTEE
230 NORTH FIRST AVENUE
SUITE 204
PHOENIX, AZ 85003

STANLEY KARTCHNER
7090 N. ORACLE ROAD, #178-204
TUCSON, AZ 85704

CERTIFICATE OF SERVICE

I, Brian C. Dault, hereby certify that copies of this notice, and copies of the attached motion and proposed order were provided via electronic filing or U.S. First Class Mail postage prepaid on this the 21st day of October 2010, to all interested parties as set forth below.

**Jeff M. Goodyear &
Molly Dee Holland**
10929 E. SUNFLOWER COURT
FLORENCE, AZ 85232

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/s/ Brian C. Dault
Brian C. Dault

Attachments:
Proposed Order

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)	
)	
)	
)	
)	
Debtors.)	Order to Reinstate Case
)	

The above captioned Debtors, having filed a motion to reinstate his case;

IT IS HEREBY ORDERED that:

1. This case be reinstated.

Dated: This ____ day of _____, 2010.

Honorable Eileen W. Hollowell